

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

9771 Clairemont Mesa Blvd., Suite B
San Diego, California 92124-1331
Telephone: (619) 265-5114

*file***CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 16, 1987

Mr. Ralph J. Edwards, Region Environmental Manager
Mobil Oil Corporation
3800 West Alameda Avenue, Suite 700
Burbank, California 91505-4331

Dear Mr. Edwards:

CLEANUP AND ABATEMENT ORDER NO. 87-132

Enclosed is Cleanup and Abatement Order No. 87-132. This Cleanup and Abatement Order is being issued to Mobil Oil Corporation under the authority of California Water Code Section 13304 in response to the unauthorized fuel release from the underground storage tank system at the former service station no. 18-GK5 located at 550 North Magnolia in El Cajon. The unauthorized fuel release has caused a "pollution" and "contamination" of the underlying ground water as defined in California Water Code Section 13050.

Basically, the Cleanup and Abatement Order directs Mobil Oil Corporation to clean up the contamination resulting from the unauthorized petroleum hydrocarbon release. The Order requires Mobil Oil Corporation to submit quarterly progress reports to this office until, in the opinion of the Executive Officer, the cleanup can be considered complete. The first quarterly progress report is due no later than January 31, 1988. A copy of these progress reports should also be sent to the County of San Diego Department of Health Services.

At some future time prior to the final phase of cleanup, Mobil Oil Corporation shall design and estimate the cost of cleaning up the site to a range of potential final cleanup levels. The Regional Board will select a set of final cleanup levels after reviewing the costs and cleanup strategies developed by Mobil Oil Corporation. The Order directs Mobil Oil Corporation to implement the cleanup strategy capable of achieving the final cleanup levels set by the Regional Board.

The issuance of Cleanup and Abatement Order No. 87-132 will be discussed at the October 5, 1987, Regional Board meeting. This meeting is open to public participation and you are welcome to attend. It is scheduled for 9:00 a.m. at the Rancho California Water District in the Board Room, 28061 Diaz Road, Temecula.

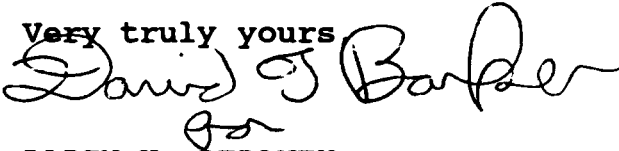
Mr. Ralph Edwards

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September 16, 1987

If you have any questions please call Mr. Scott Hugenberger at the above number.

Very truly yours

A handwritten signature in cursive script, appearing to read "David J. Barber".

LADIN H. DELANEY
Executive Officer

SGH:11

cc: Ms. Victoria Gallagher
Hazardous Materials Management Unit
County of San Diego Department of Health Services
1700 Pacific Highway
San Diego, California 92101

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

CLEANUP AND ABATEMENT ORDER NO. 87-132

**MOBIL OIL CORPORATION
FORMER SERVICE STATION NO. 18-GK5 IN EL CAJON
SAN DIEGO COUNTY**

The California Regional Water Quality Control Board, San Diego Region (hereinafter Regional Board) finds that:

1. Mobil Oil Corporation used to operate a retail gasoline station located at 550 North Magnolia Street in El Cajon. The site lies in the El Cajon Hydrographic Subarea of the Lower San Diego Hydrographic Subunit.
2. On June 30, 1986, the County of San Diego Department of Health Services (hereinafter CSDDHS) detected petroleum hydrocarbon contaminated soil at the site during the removal of three underground fuel storage tanks.
3. On December 4, 1986, this office received a Site Assessment report from Mobil Oil Corporation dated November 6, 1986 and prepared by Leighton and Associates, Incorporated. The report contained the following information:
 - a) Five borings were drilled on the site in September 1986. Soil samples collected from the borings were analyzed and found to contain as much as 95 mg/kg total petroleum hydrocarbons.
 - b) All five borings were converted to ground water monitoring wells. Ground water was encountered in the borings at approximately 30 to 35 feet below grade. Following well completion, the piezometric water levels stabilized at between 19 and 23 feet below grade. The ground water appears to be flowing in a west-northwesterly direction.
 - c) Ground water samples were collected from each monitoring well and chemically analyzed. The laboratory results are as follows:

<u>Constituent</u>	* <u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>	<u>MW-4</u>	<u>MW-5</u>
Benzene	21 mg/l	20 mg/l	25 mg/l	37 mg/l	19 mg/l
Toluene	31 mg/l	25 mg/l	33 mg/l	57 mg/l	21 mg/l
Total xylenes	17.8mg/l	14.1mg/l	17.8mg/l	40 mg/l	31.9mg/l
Ethylbenzene	3.4mg/l	2.6mg/l	3.5mg/l	6.9mg/l	3.4mg/l
Total petroleum hydrocarbons	150 mg/l	190 mg/l	220 mg/l	180 mg/l	130mg/l
Organic lead	62 µg/l	50 µg/l	70 µg/l	250 µg/l	20 µg/l

*MW stands for monitoring well

4. The Comprehensive Water Quality Control Plan Report, San Diego Basin (9) (Basin Plan) was adopted by this Regional Board on March 17, 1975; approved by the State Water Resources Control Board on March 20, 1975; and updated by the Regional Board on February 27, 1978; March 23, 1981; January 24 and October 3, 1983; and August 27, 1984. The 1978, 1981, 1983 and 1984 updates were subsequently approved by the State Board.
5. The Basin Plan established the following uses as the potential and existing beneficial uses for the ground water in the El Cajon Hydrographic Subarea:
 - a. Municipal and domestic supply
 - b. Agricultural supply
 - c. Industrial service supply
 - d. Industrial process supply
 - e. Ground water recharge
6. The Basin Plan established the following uses as the potential and existing beneficial uses for the surface waters in the El Cajon Hydrographic Subarea:
 - a. Municipal and domestic supply
 - b. Industrial service supply
 - c. Ground water recharge
 - d. Water contact recreation
 - e. Non-contact water recreation
 - f. Warm fresh water habitat
 - g. Cold fresh water habitat
 - h. Wildlife habitat
 - i. Preservation of rare and endangered species

7. The quality of the ground water underlying the Mobil service station at 550 North Magnolia Street in El Cajon is subject to the provisions of the State Water Resources Control Board's Resolution No. 68-16, Statement of Policy With Respect to Maintaining High Quality Waters in California. Under the terms and conditions of Resolution no. 68-16, the existing (pre-discharge) ground water quality of the El Cajon Hydrographic Subarea must be maintained unless it is demonstrated that a decrease in water quality
- (a) will be consistent with maximum benefit to the people of the state,
 - (b) will not unreasonably affect beneficial uses, and
 - (c) will not result in water quality less than prescribed in the Basin Plan or other adopted policies.
8. Section 13050 of the California Water Code defines "pollution" and "contamination" as follows:
- "Pollution means an alteration of the quality of the waters of the State by waste to a degree which unreasonably affects (1) such waters for beneficial uses, or (2) facilities which serve such beneficial uses."
- "Contamination means an impairment of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of disease. "Contamination" shall include any equivalent effect resulting from the disposal of waste, whether or not waters of the state are affected."
9. To protect the beneficial uses listed in Finding 5, it is necessary that the ground water aquifer underlying the Mobil Oil Corporation service station not contain constituents in concentrations exceeding the following State Department of Health Services Action levels:

<u>Constituent</u>	<u>Maximum Allowable Concentration</u>
Benzene	0.7 µg/l
Toluene	100 µg/l
Total xylenes	620 µg/l
Ethylbenzene	680 µg/l
Total lead	50 µg/l

10. The presence of petroleum hydrocarbons in the ground water underlying the Mobil Oil Corporation service station

constitutes a "pollution" and a "contamination" of the State's waters as defined in Finding 8 in accordance with the following rationale:

- a. Petroleum hydrocarbon constituents discharged from the underground storage tank system have migrated to the underlying ground water.
 - b. The resulting concentrations of petroleum hydrocarbons in the underlying ground water, listed in Finding 3, exceed the State Department of Health Services (SDOHS) drinking water action levels listed in Finding 9 and therefore has impaired the ground water for any existing or potential municipal and domestic supply.
11. This enforcement action is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with Section 15321, Chapter 3, Title 14, California Administrative Code.

IT IS HEREBY ORDERED, That pursuant to Section 13304 of the California Water Code, Mobil Oil Corporation (hereinafter the discharger) shall comply with the following directives:

1. The discharger shall take effective remedial action to:
 - a. Immobilize the free product plume, if any, and the dissolved product plume of petroleum hydrocarbon contaminated ground water.
 - b. Protect the beneficial uses of the ground water of the El Cajon Hydrographic Subarea.
 - c. Clean up the petroleum hydrocarbon contaminated ground water and soil to the Regional Board's satisfaction.
2. The discharger shall submit monitoring reports to this office on a quarterly basis until, in the opinion of the Regional Board Executive Officer, the site has been cleaned up. The monitoring reports shall describe the progress made in the cleanup operations and shall demonstrate that the petroleum hydrocarbon waste released from the Mobil Oil Corporation service station has been and

remains immobilized. The quarterly monitoring reports shall include, but not be limited to, the following information:

- a. Quantity of petroleum hydrocarbon product recovered for the quarter and the total to date.
- b. Quantity of ground water extracted for the quarter, the total to date, and its ultimate disposal point.
- c. The water levels and product thicknesses in all of the wells.
- d. Any information necessary to demonstrate that the petroleum hydrocarbon contamination resulting from the unauthorized release from the underground tank system at the site is fully contained and immobilized or shrinking.
- e. A map of the site with hydrologic contours showing the ground water flow pattern and the locations of all of the wells.
- f. A map of the site showing the boundary of the free petroleum hydrocarbon product plume and also of the dissolved product ground water plume.
- g. All ground water samples should be analyzed for:
 - (1) Benzene
 - (2) Toluene
 - (3) Total xylenes
 - (4) Ethylbenzene
 - (5) Total petroleum hydrocarbons
 - (6) Chlorinated hydrocarbons, if these constituents were contained in the discharge
 - (7) Organic lead, if this constituent was contained in the discharge.
- h. A description of the remedial actions employed by the discharger.

The quarterly monitoring reports shall be submitted to this Office in accordance with the following schedule:

<u>Reporting Period</u>	<u>Date Due</u>
January, February, March	April 30
April, May, June	July 31
July, August, September	October 31
October, November, December	January 31

3. The discharger shall submit a report to this office no later than November 9, 1987, characterizing the vertical and horizontal extent of the petroleum hydrocarbon contamination resulting from the unauthorized release from the underground storage tank systems at the Mobil service station in El Cajon. The report shall contain the following information:
 - a. A site map showing the location of all borings and monitoring wells, the locations of the excavated tanks, and any underground utilities that might act as conduits along which the petroleum hydrocarbons could migrate.
 - b. The water levels and product thicknesses, if any, in all of the wells.
 - c. A site map showing the hydrologic contours and the boundary of the free product and dissolved product ground water contamination plumes.
 - d. The laboratory results of the chemical analyses on the soil and ground water samples collected during the site investigation. Samples should be analyzed for:
 - (i) Benzene
 - (ii) Toluene
 - (iii) Total xylenes
 - (iv) Organic lead
 - (v) Total petroleum hydrocarbons
 - (vi) Ethylbenzene
 - e. A remedial action strategy to clean up the effects of the unauthorized release from the excavated underground storage tank system at the Mobil service station site. The strategy should address the removal and/or treatment of the free product plume (if any), the dissolved product ground water plume, and the soil contamination zone.
4. Upon direction of the Executive Officer at some point in the future, before the hazardous substance spill site cleanup program can be terminated, the discharger shall submit a report to this office identifying and developing a range of remedial action alternatives for the final phase of the cleanup program. The report shall examine and determine the cost of cleanup strategies capable of achieving each of the following potential final cleanup levels in the affected ground water zone:

- a. Treatment and/or removal of the polluted ground water to attain the naturally occurring background concentrations for the following constituents in the underlying ground water aquifer:

- (1) Benzene
- (2) Toluene
- (3) Total xylenes
- (4) Ethylbenzene
- (5) Total lead

This cleanup alternative represents basically complete cleanup of pollution resulting from the petroleum hydrocarbon discharge. If the discharger wishes to implement this cleanup alternative, the discharger will not be required to develop cleanup strategies corresponding to alternatives 4(b) and 4(c).

- b. A remedial action alternative proposing the attainment of petroleum hydrocarbon concentrations less stringent than those specified in (a). This alternative concedes the affected ground water to a degraded status. It will be necessary to establish, that the petroleum hydrocarbon concentrations being proposed by the discharger under this alternative would comply with the following criteria in accordance with Resolution No. 68-16:

- (1) The proposed petroleum hydrocarbon concentrations to be attained in the affected ground water pollution zone would not unreasonably affect the beneficial uses of the ground water listed in Finding 5 or of any hydraulically connected surface waters.
- (2) The proposed petroleum hydrocarbon concentrations to be attained in the affected ground water pollution zone will be consistent with the maximum benefit to the people of the State.
- (3) The proposed petroleum hydrocarbon concentrations to be attained in the affected ground water pollution zone will not result in water quality less than prescribed in the Basin Plan or other adopted policies.

- c. Treatment and/or removal of the polluted ground water to attain the following State Department of Health

Services Action Levels in the underlying ground water aquifer:

<u>Constituent</u>	<u>Maximum Concentration</u>
Benzene	0.7 µg/l
Toluene	100 µg/l
Total xylenes	620 µg/l
Ethylbenzene	680 µg/l
Lead	50 µg/l

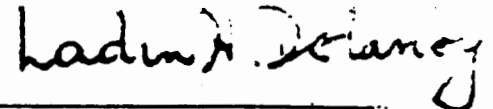
All free petroleum hydrocarbon product must be removed under all three alternatives. The report should include a table summarizing the cleanup level versus cost information.

5. The cleanup alternatives required under Directive 3 of this Order will be evaluated in detail by Regional Board staff. This evaluation will include technical considerations, estimated costs, and anticipated water quality impacts associated with each alternative. Based on this evaluation a specific set of final cleanup levels will be selected by the Regional Board. Upon notification by the Executive Officer, the discharger shall implement a cleanup strategy capable of achieving the final cleanup levels selected by the Regional Board.
6. The discharger shall remove and/or treat all soil containing total extractable petroleum hydrocarbons in concentrations exceeding 100 mg/kg, unless the discharger can demonstrate:
 - (a) to the Regional Board staff's satisfaction that higher soil concentrations will not result, under ambient environmental conditions at the site, in waste constituents being released at concentrations which could degrade the quality of the underlying ground water; and
 - (b) to the County of San Diego Department of Health Services that higher soil concentrations will not present a threat to the public or environmental health.
7. The discharger shall dispose of all ground water and/or soil polluted with petroleum hydrocarbons in accordance with all applicable local, state and federal regulations.

September 16, 1987

8. After the discharger demonstrates to the Regional Board Executive Officer's satisfaction that the final cleanup levels, as determined by the Regional Board under Directives 5 and 6, have been achieved throughout the soil and ground water contamination zones, the discharger shall continue to monitor the ground water and submit quarterly monitoring reports in accordance with Directive 2 of this Order for a period of one year. If at any time during this post-cleanup monitoring the data indicate that the final cleanup levels have not been maintained, the discharger shall immediately resume appropriate remedial cleanup actions. If, on the other hand, the data indicate that the soil is not contributing petroleum hydrocarbon constituents to the ground water and the final cleanup levels have not been exceeded for the year of monitoring, then no further monitoring shall be required.

Ordered by



Ladin H. Delaney
Executive Office

Dated: September 16, 1987

SGH:11

State of California
Regional Water Quality Control Board
San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT
October 5, 1987

Item: 16(e)

Subject: ENFORCEMENT
CLEANUP AND ABATEMENT ORDER NO. 87-132
MOBIL OIL CORPORATION, FORMER SERVICE STATION
NO. 18-GK5 IN EL CAJON
SAN DIEGO COUNTY

Discussion: Mobil Oil Corporation used to operated a retail gasoline station at 550 North Magnolia Street in El Cajon. A leak in underground storage tank system at the former Mobil station has resulted in the pollution of the underlying ground water.

On September 16, 1987, the Executive Officer issued Cleanup and Abatement Order No. 87-132 to Mobil Oil Corporation in response to the soil and ground water contamination at the former Mobil station. The Cleanup and Abatement Order contained in today's agenda directs Mobil Oil Corporation to cleanup the petroleum hydrocarbon contamination resulting from the underground fuel tank leak and to submit quarterly progress reports to this office for the remainder of the cleanup program.

Issue: Does Mobil Oil Corporation have any objections to the issuance of Cleanup and Abatement Order No. 87-132?

Recommendation: Staff will make a brief presentation on this item if necessary.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

9771 Clairemont Mesa Blvd., Suite B
San Diego, California 92124-1331
Telephone: (619) 285-5114



September 1, 1988

Mr. R.J. Edwards
Region Environmental Manager
Mobil Oil Corporation
3800 West Alameda Avenue, Suite 700
Burbank, California 91505-4331

Dear Mr. Edwards:

VIOLATIONS OF CLEANUP AND ABATEMENT ORDER NO. 87-132, EL CAJON

This letter is in response to your letter dated March 14, 1988 requesting that Cleanup and Abatement Order No. 87-132 for former Mobil Service Station No. 18-GK5 be rescinded. Based on the information in our files on the Mobil site and the adjacent Chevron site, I cannot recommend to the Regional Board a rescission of Order No. 87-132. The information in our files is not sufficient to demonstrate that Mobil Oil Corporation is not responsible for the petroleum hydrocarbon contamination that is present at the site. The Cleanup and Abatement Order remains in effect as issued on September 16, 1987 and Mobil Oil Corporation is still responsible for compliance with the Order. I recognize that Chevron USA, Incorporated also has a fuel contamination problem originating from their former gasoline station and that the two contamination plumes may overlap. In the near future, this office will be issuing either a separate Cleanup and Abatement Order to Chevron, or an Addendum to Order No. 87-132 to combine both sites into one and to include Chevron as a responsible party. In the meantime, I understand that Chevron USA, Incorporated has expressed a willingness to coordinate cleanup actions with Mobil Oil Corporation. I strongly encourage cooperation between Mobil and Chevron to facilitate the efficient remediation of the subsurface petroleum hydrocarbon contamination emanating from the two former service stations.

Finally, upon review of your file, I find that Mobil Oil Corporation is in violation of Cleanup and Abatement Order No. 87-132. A Notice of Violation will be issued to Mobil under separate cover in the near future. In the meantime I strongly recommend that Mobil make every effort to get into compliance with Order No. 87-132, including the initiation of active remediation actions and the characterization of the extent of the contamination zone. The boundaries of the ground water plume have not yet been defined. According to information submitted to this office by Chevron, free product that has been found on the ground water

Mr. Edwards

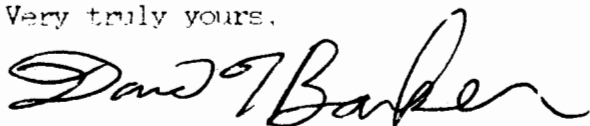
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September 1, 1988

in monitoring wells on their property appears to match Mobil's product rather than Chevron's gasoline. I am going to ask Chevron that they allow you access to their property for purposes of investigation and remediation of the fuel contamination.

If you have any questions, please call Mr. Scott Hugenberger at the above number.

Very truly yours,



DAVID T. PARKER
Senior Engineer

EGH:egh

cc: Ms. Vickie Church
Hazardous Materials Management Division
County of San Diego Department of Health Services
1700 Pacific Highway
San Diego, California 92101

Mr. Dan Lynch
Chevron USA, Inc.
P.O. Box 2833
La Habra, California
90632-2833

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

9771 Clairemont Mesa Blvd., Ste. B
San Diego, California 92124-1331
Telephone: (619) 286-5114

**CERTIFIED - RETURN RECEIPT REQUESTED**

P 105 662 756

December 8, 1988

Mr. Daniel Lynch
Engineer-Environmental Projects
Chevron USA, Incorporated
P.O. Box 2833
La Habra, CA 90632-2833

Mr. R. J. Edwards
Region Environmental Manager
Mobile Oil Corporation
3800 West Alameda Avenue, Suite 700
Burbank, CA 91505-4331

CERTIFIED MAIL RETURN RECEIPT REQUESTED

P 105 662 757

Dear Mr. Lynch and Mr. Edwards:

ADDENDUM NO. 1 TO CLEANUP AND ABATEMENT ORDER NO. 87-132, MOBILE OIL CORPORATION AND CHEVRON USA, INCORPORATED, FORMER SERVICE STATIONS NO. 18 GK5 AND NO. 9-9094 IN EL CAJON, SAN DIEGO COUNTY

Enclosed please find a copy of Addendum No. 1 to Cleanup and Abatement Order No. 87-132. As you know, on September 16, 1987, Cleanup and Abatement Order No. 87-132 was issued to Mobile Oil Corporation in response to the presence of soil and ground water contamination resulting from an underground fuel storage tank leak at the former Mobile Service Station No. 18-GK5 in El Cajon. A copy of Cleanup and Abatement Order No. 87-132 is enclosed for your convenience. It was subsequently found that the underground fuel storage tank system at the former Chevron USA, Incorporated Service Station No. 9-9094 immediately adjacent to the former Mobil Station also leaked an unknown quantity of fuel hydrocarbons to the subsurface. Since the zones of contamination resulting from the two adjacent fuel leaks appear to overlap, the most efficient way to effectively remediate the site is through coordination of the cleanup efforts of Chevron and Mobil. In recognition of this, Addendum No. 1 to Order No. 87-132 is being issued to Chevron USA, Incorporated and Mobil Oil Corporation. The Addendum adds Chevron USA, Incorporated to the Cleanup and Abatement Order and treats the two contamination zones as one big plume. Responsibility for the cleanup of this big plume rests with both Chevron and Mobil. I strongly urge Chevron USA, Incorporated and Mobil Oil Corporation to cooperate and respond promptly and completely to the terms and conditions of the Cleanup and Abatement Order and the Addendum thereto.

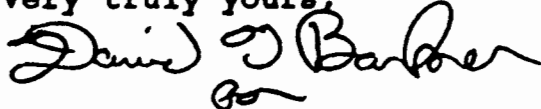
You are hereby notified that you have the right to a public hearing before the Regional Board concerning Addendum No. 1 to Order No. 87-132 on January 23, 1989. If you desire to have a

Daniel Lynch & R. J. Edwards 2

December 8, 1988

public hearing at the Regional Board's January 23, 1989 meeting, you must notify this office of your request for the public hearing in writing by December 15 1988. If no written request for a public hearing is received by December 15, 1988, then a public hearing will not be scheduled. The January 23, 1989 Regional Board meeting will begin at 9:00 a.m. in Room B109 of the State Office Building, 1350 Front Street, San Diego. If you have any questions, please call Mr. Jim Munch at the above number.

Very truly yours,



LADIN H. DELANEY
Executive Officer

SH:rc

enclosure

cc: Mr. Donn Lipera
Hazardous Materials Management Division
County of San Diego Department of Health Services
PO Box 85261
San Diego, CA 92138-5261

Dec. 8, 1988

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

**ADDENDUM NO. 1 TO CLEANUP AND ABATEMENT ORDER NO. 87-132
MOBIL OIL CORPORATION AND CHEVRON USA, INCORPORATED
FORMER SERVICE STATIONS NO. 18-GK5 and No. 9-9094 IN EL CAJON
SAN DIEGO COUNTY**

The California Regional Water Quality Control Board, San Diego Region (hereinafter Regional Board) finds that:

1. On September 16, 1987, the Executive Officer issued Cleanup and Abatement Order No. 87-132 to Mobil Oil Corporation in response to the presence of petroleum hydrocarbon contamination in the soil and ground water at the former Mobil Service Station No. 18-GK5 located at 550 North Magnolia in El Cajon.
2. An abandoned Chevron Service Station No. 9-9094 is located immediately adjacent to, and to the south of the former Mobil Service Station No. 18-GK5. Chevron USA, Incorporated is still leasing its property, located at 500 North Magnolia in El Cajon. Mobil Oil Corporation still owns the property which used to be occupied by the former service station No. 18-GK5.
3. On December 1, 1987, three underground fuel storage tanks and one waste oil tank were removed from the former Chevron Service Station No. 9-9094. During the tank removal, an inspector from the Hazardous Materials Management Division (HMMMD) of the County of San Diego Department of Health Services detected petroleum hydrocarbon contaminated soil and ponded fuel product in the tank excavation.
4. The results of subsequent subsurface investigation by Chevron USA, Incorporated are contained in two reports prepared by Groundwater Technology, Incorporated dated January 21 and May 10, 1988. The investigation revealed the presence of elevated levels of petroleum hydrocarbon contamination dissolved in the ground water in monitoring wells located in and near the former tank excavation pit. Petroleum hydrocarbon constituents were found in the ground water in concentrations as high as the following:

<u>Constituent</u>	<u>Concentration</u>
Benzene	12 mg/l
Toluene	34 mg/l
Total Xylenes	16 mg/l
Ethylbenzene	1.8 mg/l
Total Petroleum Hydrocarbons	99 mg/l

Fuel product was found floating on the ground water in two monitoring wells located near the Chevron/Mobil boundary line. The ground water flow direction appears to be from the former Chevron station to the former Mobil station.

5. Chevron USA, Incorporated has caused a "pollution" of the state's waters as defined in Finding No. 8 of Order No. 87-132 in accordance with the following rationale:
 - a) Petroleum hydrocarbon constituents have been released from the underground fuel storage tank system at the former Chevron Service Station No. 9-9094 and have migrated to the underlying ground water.
 - b) The resulting concentrations of petroleum hydrocarbons in the underlying ground water, listed in Finding No. 4 above, exceed the State Department of Health Services drinking water action levels listed in Finding No. 9 of Order No. 87-132 and therefore have impaired the ground water for any existing or potential municipal and domestic supply.
6. Based on information submitted to this office by the dischargers, it is not possible to distinguish two separate zones of ground water contamination, one resulting from the former Chevron station and one resulting from the former Mobil station. The fuel releases from the former Mobil and Chevron underground fuel storage tank systems have caused overlapping zones of ground water contamination, effectively resulting in one large overall ground water contamination zone. The full extent of this ground water fuel contamination zone has not yet been determined. It is likely that the ground water contamination zone extends beyond the property boundaries of the former Chevron and Mobil service stations.

7. The Regional Board finds and concludes that, rather than treating the adjacent Chevron and Mobil sites separately and independently, the cleanup of the overlapping ground water contamination zones originating from the former Chevron and Mobil service stations can be efficiently accomplished through the coordination of the cleanup efforts of Chevron and Mobil.
8. This Addendum No. 1 to Order No. 87-132 is being issued in order to add Chevron USA, Incorporated as a party responsible for compliance with Cleanup and Abatement Order No. 87-132, and to include the fuel contamination plume originating from the former Chevron Service Station No. 90-9094 as as a part of the overall fuel contamination zone subject to remediation under Cleanup and Abatement Order No. 87-132.

It is hereby Ordered, that Cleanup and Abatement Order No 87-132 is amended as follows:

1. The word "discharger" as used in the Directives of Cleanup and Abatement Order No. 87-132 shall hereafter be construed to include the following parties: Mobil Oil Corporation and Chevron USA, Incorporated. Both of these parties are responsible for compliance with Cleanup and Abatement Order No. 87-132 and for the cleanup of the affected ground water contamination zone(s) originating from the former Mobil and Chevron service stations.
2. The dischargers shall submit a report to this office no later than January 31, 1989 characterizing the vertical and horizontal extent of the petroleum hydrocarbon contamination resulting from the release from the underground storage tank systems at the former Mobil and Chevron service stations. The report must include all of the information listed in Directive No. 3 of Order No. 87-132. Ground water samples must be collected and analyzed from a sufficient number of properly located monitoring wells to determine the boundaries of the floating product and the dissolved product contamination zones. This will require the installation of additional ground water monitoring wells, possibly off-site.
3. No later than February 28, 1989 the discharger shall submit a report to this office confirming that an active ground water remediation system has been installed and is operating properly.

Addendum No. 1 to
Cleanup and Abatement
Order No. 87-132

4

4. The report required by Directive No. 4 of Order No. 87-132 shall be submitted to this office no later than January 31, 1990.
5. The dischargers shall submit a report to this office no later than January 31, 1991 demonstrating that the site has been cleaned up throughout the affected soil and ground water contamination zones to the Executive Officer's satisfaction.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

In the matter of the)	
)	
Mobil Oil Corporation)	Notice of Violation
)	
Service Station No. 18-GK5)	
)	
550 N. Magnolia, El Cajon)	N88-UGT003
)	
San Diego County)	

You are hereby notified that:

1. On September 16, 1987 the Executive Officer issued Cleanup and Abatement Order No. 87-132 to Mobil Oil Corporation in response to the presence of subsurface fuel contamination at the former Mobil Service Station No. 18-GK5 located at 550 N. Magnolia in El Cajon. Directive No. 2 of Order No. 87-132 requires Mobil Oil Corporation to submit monitoring/progress reports to this office on a quarterly basis until the site has been cleaned up to the satisfaction of the Regional Board Executive Officer. The monitoring/progress reports are required to contain sufficient information to demonstrate that the ground water contamination plume has been immobilized. This requires the collection and analysis of ground water samples from however many monitoring wells are necessary to delimit the location and extent of the ground water contamination plume(s). The due dates for the first three monitoring/progress reports were as follows:

<u>Quarterly period</u>	<u>Due Date</u>
October, November, December	January 31, 1988
January, February, March	April 30, 1988
April, May, June	July 31, 1988

Mobil Oil Corporation failed to submit the October, November, December quarterly monitoring/progress report by the January 31, 1988 due date.

2. By letter dated February 11, 1988 this office notified Mobil Oil Corporation of their failure to submit the January 31, 1988 quarterly monitoring/progress report. The letter required Mobil Oil Corporation to submit this report no later than March 15, 1988. On March 14, 1988 Mobil Oil Corporation submitted a report to this office dated March 8, 1988. This report does not contain the information required under Directive No. 2 of Order No. 87-132.

3. As of September 26, 1988 Mobil Oil Corporation has not submitted to this office the information necessary to fulfill the monitoring requirements contained in Directive No. 2 of Order No. 87-132 for the October, November, December 1987 quarter, the January, February, March 1988 quarter, and the April, May, June 1988 quarter. The failure to submit these three quarterly reports constitutes three violations of Cleanup and Abatement Order No. 87-132.
4. Directive No. 1 of Order No. 87-132 required Mobil Oil Corporation to: "Immobilize the free product plume, if any, and the dissolved product plume of petroleum hydrocarbon contaminated ground water." As of September 26, 1988, no information has been submitted to this office indicating that any actions have been undertaken to immobilize the ground water contamination. During a site investigation on September 26, 1988 Regional Board staff noted that no ground water extraction equipment was installed or operating at the site. The fact that no ground water extraction or free product extraction operations have been employed at the site means that the ground water contamination plume has been free to migrate in an uncontrolled manner. This constitutes a violation of Directive No. 1 (a) of Cleanup and Abatement Order No. 87-132.
5. Directive No. 3 of Cleanup and Abatement Order No. 87-132 required Mobil Oil Corporation to submit a report to this office no later than November 9, 1987 characterizing the vertical and horizontal extent of the petroleum hydrocarbon contamination. On December 21, 1987 Mobil Oil Corporation submitted a report dated December 8, 1987 and prepared by Owen Geotechnical. The report contains no ground water sampling data and so the boundaries of the ground water contamination plume can not be ascertained. Therefore, since the vertical and horizontal extent of the contamination was not determined, Mobil Oil Corporation is in violation of Cleanup and Abatement Order No. 87-132. As of September 26, 1988, the most recent ground water sampling data submitted to this office by Mobil was collected on September 8, 1987 before the issuance of Order No. 87-132. Three monitoring wells were sampled and all three contained high levels of benzene. The areal extent of this petroleum hydrocarbon ground water contamination plume has not been determined as of September 26, 1988.
6. The issuance of this notice of violation to Mobil Oil Corporation is based on the following facts:

On December 4, 1986 Mobil Oil Corporation submitted a report to this office dated November 6, 1986 containing the results of ground water sampling at the former Mobil Service Station No. 18-GK5. Water samples collected from five ground water monitoring wells were analysed and all five contained elevated levels of fuel hydrocarbon contaminants. In response to this data, the Regional Board Executive Officer issued Cleanup and Abatement Order No. 87-132 to Mobil Oil Corporation on September 16, 1987. Directive No. 3 of Order No. 87-132 required Mobil Oil Corporation to define the vertical and horizontal extent of the zone of petroleum hydrocarbon contamination and to submit this data to this office no later than November 9, 1987. As of September 26, 1988 the extent of the petroleum hydrocarbon contamination has not been determined. Directive No. 1 required Mobil to immobilize the free product, if any, and the dissolved product ground water contamination plumes. As of September 26, 1988, no ground water pumping operations or other equivalent appropriate actions have been implemented. This has allowed the ground water contamination plume to migrate freely. This constitutes a violation of Directive No. 1 of Order No. 87-132. Directive No. 2 required Mobil Oil Corporation to submit quarterly monitoring/progress reports to this office containing at a minimum the information specified in Directive No. 2. As of September 26, 1988 this office has not received the information required by Directive No. 2 for any of the first three required monitoring/progress reports. This constitutes a violation of Directive No. 2 of Order No. 87-132.

7. You are hereby directed to submit a report to this office no later than November 30, 1988 containing the results of a subsurface investigation to define the vertical and horizontal extent of the ground water contamination plume. This requires the installation and sampling of however many ground water monitoring wells are sufficient to define the boundaries of the contamination zone(s). The report must also include, at a minimum, the information specified in Directive No. 3 of Order No. 87-132. The report must be signed by a California registered geologist or engineer. If Mobil Oil Corporation fails to submit the required information by November 30, 1988, the Regional Board may take appropriate enforcement actions authorized by Division 7 of the California Water Code commencing with Section 13000, including the possible assessment of administrative civil liability of up to one thousand dollars (\$1000.00) per day of violation of this notice of violation or referral to the State Attorney General for judicial sanctions.
8. You are hereby directed to immediately institute whatever appropriate actions are necessary to achieve compliance with Directive No. 1 of Order No. 87-132. Please submit a report to this office no later than November 1, 1988 describing the remedial actions you have instituted to capture the ground water contamination plume.

October 4, 1988

9. Questions pertaining to the issuance of this notice of violation should be directed to Mr. Scott Hugenberger at (619) 265-5114 between the hours of 8:00 a.m. to 4:00 p.m. Monday through Friday. Written correspondence pertaining to the issuance of this notice of violation should be directed to the following address:

Mr. Ladin H. Delaney
Executive Officer
California Regional Water Quality Control Board
San Diego Region
9771 Clairemont Mesa Blvd. Suite B
San Diego, California 92124-1331

Ladin H. Delaney

LADIN H. DELANEY
Executive Officer

Date: October 4, 1988

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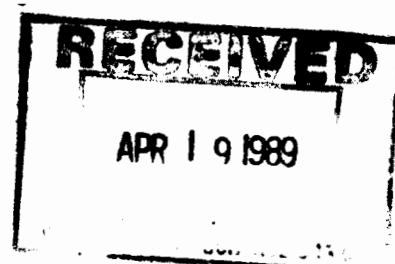
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JANICE BROWN TEAGUE
MICHAEL J. SNIDER
PETER O. SCHLUEDERBERG
RICHARD E. GRABER

April 17, 1989

Mr. Jim Munch
California Regional Water
Quality Control Board
San Diego Region
9771 Clairemont Mesa Boulevard
Suite B
San Diego, CA 92124-1331

500 N. Munch



RE: Clean-up and Abatement Order No. 87-132;
adjacent property
Our File No. 6961.38643

Dear Mr. Munch:

This letter will confirm our telephone conversation of April 17, 1989 in which I informed you that clients of mine were considering purchasing property which may be in the vicinity of the contamination zones described in California Regional Water Quality Control Board (the "Board") Clean-up and Abatement Order No. 87-132 (the "Abatement Order"). You informed me that pursuant to the Abatement Order, Mobil and Chevron have assumed liability for contamination in the area, and have agreed to investigate, stabilize and remove such contamination, including contamination which may have spread to other properties in the area. As I informed you, the property my clients are interested in is not the Mobil or Chevron property, but is nearby property which might be contaminated by the contamination emanating from the Mobil and Chevron properties. You informed me that, as owners of this nearby property, that my clients would only be subject to action of the Board if (i) they refused to grant access to their property by Mobil and/or Chevron for the purpose of installing a well or performing other remedial activity; or (ii) if a fuel tank or other evidence of a source of contamination is discovered on their property indicating that their property is a source of contamination. Barring these two possibilities, my clients would not be responsible in any way for clean-up of this contamination, since Mobil and Chevron

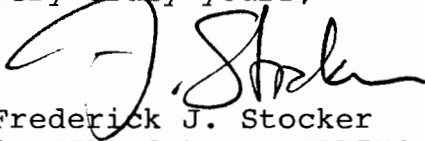
Handwritten notes:
A. 19
Chevron
500 N. Munch
8th April 1989

Mr. Jim Munch
April 17, 1989
Page 2

have already been cited, and have assumed responsibility for clean-up of this contamination.

Thank you very much for your assistance in this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "F. Stocker". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "S".

Frederick J. Stocker
SELTZER CAPLAN WILKINS & McMAHON

FJS/mdp